CORRES. CONTROL INCOMING LTR NO.

4713RF93

DUE DATE

ACTION LTR ENC DIST. BENEDETTI, R.L. BENJAMIN, A BERMAN, H.S CARNIVAL, G.J COPP, R.D. CORDOVA, R.C. DAVIS, J.G. FERRERA, D.W. FRANZ, W.A. HANNI, B.J. HEALY, T.J. HEDAHL, T.G. HILBIG, J.G. HUTCHINS, N.M. KIRBY, W.A. KUESTER, A.W MAHAFFEY, J.W MANN, H.P. MARX, G.E McKENNA, F.G. MORGAN, R.V. PIZZUTO, V.M.

nesta

POTTER, G.L.

SANDLIN, N.B. SATTERWHITE, D.G SCHUBERT, A.L. SETLOCK, G.H.

SULLIVAN, M.T. SWANSON, E.R.

WILKINSON, R.B. WILSON, J.M.

CORRES CONTROL X X 2ATS/T130G LDMN RECORD/080 X

Reviewed for Addressee Corres, Control RFP

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Department of Energy

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Rocky Flats Office

OCT 26 1993

EGRO ROCKY FLATS PLANT CORRESPONDENCE CONTROL

EPD:PMP:12325

National Environmental Policy Act Documentation for the OU 2 Remediation

Rich Schassburger, Environmental Restoration Division

I have reviewed the revised Action Description Memorandum (ADM) that EG&G transmitted to Rocky Flats Office on October 19, 1993. I realize that the activities presented in the ADM are thought to represent a worst case scenario for remediation at OU 2, but I still have grave concerns about an environmental assessment being adequate NEPA documentation for the described activities, particularly the soil remediation. My recommendation is still to prepare environmental impact statement level documentation for OU 2. I'm basing my recommendation on the following four factors that I feel have the potential to make the remediation a high profile, controversial activity:

- 1) Potential for re-suspension of plutonium contaminated dust during excavation of soils on 61 acres
- 2) Lack of demonstrated success in reclaiming disturbed land around RFP (such as at OU 3) which reduces the prospects of being able to successfully revegetate the disturbed 61 acres and therefore mitigate the impacts from remediation
- 3) A reference in the ADM to the need to construct a waste storage facility which should be considered in the context of waste management for the plant as a whole
- 4) The necessity to identify the potential impacts in a public forum which includes RFP's Natural Resource Trustees so that if RFP is required to implement a remedy that has severe impacts to the natural environment, the Trustees will have been involved in the decision making process

The ADM states that remedial activity is not scheduled to begin until 1996. Since the scheduled completion date for the Site Wide Environmental Impact Statement (SWEIS) is August of 1996, I recommend that this issue be analyzed in the SWEIS rather than in a separate NEPA document.

Patricia M. Powell

NEPA Compliance Officer

cc:
J. K. Hartman, AMTER
M. E. Roy, OCC
E. A. Howard, EPD
S. Grace, ERD
P. M. Powell, EPD
S. M. Nesta, EG&G